

FILED

JUL 16 2018

United State's District Court
Northern District OF Illinois
Eastern Division

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT
Donta Lucas

Plaintiff

Case NO : 18-CV-4242

Honorable Judge Andrea Woods

V.

City of Chicago, et al

Defendants

Motion For leave To Amend Plaintiff
to Complaint

Plaintiff, Erick B. Coleman, pursuant to Rules 15(a) and 19(a), Fed. R. Civ. P., requests to file an amended complaint and adding a party as Plaintiff to Complaint.

1. Plaintiff, Erick B. Coleman, is a detainee at the Cook County Jail, Since the filing of the complaint, Donta Lucas V. City of Chicago in case NO: 18-CV-4242, the plaintiff Erick B. Coleman has determined that the actions of the Defendants reflect Mr. Coleman's claims, and the claims in case No: 18-CV-4242
2. Defendants have racially profiled the plaintiff, and have illegally place Mr. Coleman in the Chicago Police Department gang database system, without his consent. In doing so intentionally, deliberately as a practice and pattern of the Chicago Police Department.

3. Plaintiff, Mr Coleman has never been in a street gang, to be subjected, to be placed in the City of Chicago Police department gang database system. Plaintiff has never admitted to the Chicago Police Department, Police officer, Public Servant, Law enforcement officer, Detective's, undercover Police officer's, gang unit, Cook County Sheriff's that he was a gangmember, or to anybody.
4. Plaintiff has no picture's, tattoo's, arrest in gang sweeps, or any involvement in a street gang to be placed as a documented street gangster disciple. Mr. Coleman has not knowingly, willingly, intentionally, or voluntarily made him self subject to be placed in the Chicago Police Department street gang database. Any contract that may be in place concerning me to the CPD, by informants Confidential reliable informants, or any Agents by the CPD is false presumptions, and is so under color of law, must be under threat, duress and /or coercion, and must be conducted ambiguously. An Affidavit was sent by Plaintiff to CPD, 3510 S. Michigan in which they refuse to respond, in 2017.
5. Defendants is subjecting the Plaintiff to be charge as a documented gangmember in the gang database when he is not a gangmember at all. Plaintiff has been stalked by Police harrassment, racial Discriminatory policing, violent police abuse falsely arrested, forced into pleading guilty to charge's he did not commit, and treated unjustly, unfairly in which is violating the plaintiff's right's. For example Plaintiff was targeted by police during a traffic stop, arrested and was Extorted by the CPD to pay 150 dollar's to bond out of Jail for gang profile in the gang database, even when he is not even a gang member. This is being done for the City of Chicago financial gain and

arrest round up by Chicago Police Department to meet their monthly arrest quarter in which is a practice and pattern.

6. The illegally gang profile, gang database that is placed upon Mr. Coleman has caused damage to the plaintiff, Defamation (libel and slander), the falsified reports, documents harms the plaintiff reputation, by being false imprisonment unlawfully restrain and he has and will to continue to suffer irreparable harm due to being unjustly, racial profiled, and illegally placed in the City of Chicago Police Department gang database system, when he is not even a gangmember. For example plaintiff will not be able to obtain certain job's or excepted into certain membership's and private organizations.
7. See Swanson V. Citibank, NA, 614 F. 3d 400, 404 (7th Cir. 2010) (explaining after Iqbal that the plaintiff need only "give enough details about the subject-matter of the case to present a story that holds together.") The remedy should be kept wide and liberal and not restricted by technicalities Koziol V. Village of Rosemont 321 F. App. 2d 320 177 N.E. 2d 867 (1 District) 1961.
8. This court should grant leave freely to amend plaintiff to complaint. Forman V. Davis, 371 U.S. 178, 182 (1962).

7-5-2018

Respectfully Yours
Erick B. Coleman
~~without prejudice~~
Erick B. Coleman
without prejudice u/c 1-207
non-resident / non-domestic
First Class U.S. Delivery
P.O. Box 089002
2017-0107125
Chicago, Illinois

Proof of Service

I, Erick B. Coleman swear under the penalty that I place the document Motion For leave To Amend Plaintiff to Complaint, and serve it on the clerk of the court by placing it in the Cook County Jail Mail System on 7-5-2018

Respectfully Yours
Erick B. Coleman
without prejudice ucc 1-207

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Without Prejudice ucc 1-207
nonresident/nondomestic
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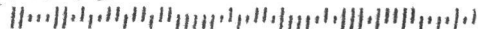
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United States Courthouse
219 South Dearborn Street
Chicago, Illinois



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